

**In The District Court of the United States
for the Western District of Missouri**

Charles Poole,
Plaintiff,

vs. .

Convergent Outsourcing Inc.,
Defendant,

)
)
) Case: 4:14-CV-00662-BCW
)
) ORDER FOR SUMMARY
) JUDGEMENT
)
)

ORDER FOR SUMMARY JUDGEMENT

Comes now Charles Poole, Plaintiff's order for summary judgment.

**CLAIMS UPON WHICH JUDGMENT IS
SOUGHT**

1. CONVERGENT OUTSOURCING INC. has failed to produce the requested documents or an affidavit means that without verification and validation of this account under Title 15 U.S.C.1681b, that there is no controversy in this matter and Defendant has therefore failed to state a lawful defense in this matter to prove they had permissible purpose to pull my credit.
2. CONVERGENT OUTSOURCING INC. has not provided an affidavit with the following proof that would show they are the creditor/real party in interest and that they have truthfully validated and verified this impermissible pull.
4. CONVERGENT OUTSOURCING INC, as a debt collector, show in their pleading they had knowledge of the impermissible pull on my consumer credit report, which would indicate willful and negligent violations, as well as Identity theft for obtaining my personal records as it appears the Missouri Revised Statutes states.

5. CONVERGENT OUTSOURCING INC has failed to provide any of the answers they were given through interrogatives.

6. CONVERGENT OUTSOURCING INC failure to disclose any material facts is a fraudulent misrepresentation by omission and their defense is null and void.

WHEREFORE, the Plaintiff-Consumer, requests the following relief:

- a) Judgment for the Defendant now demands maximum allowable damages and reasonable fees, pursuant to my original complaint.
- c) For such other Treble or Punitive relief as the court deems just and proper.

By: Charles Poole
Charles Poole,
2104 Montgall
Kansas City, Missouri 64127

PROOF OF SERVICE

I, Charles Poole, the Plaintiff-Consumer, certify that a copy of the ORDER FOR SUMMARY was placed in the U.S. Mail on 25/15 by U.S. Mail to be delivered to 2104 Montgall, Kansas City, Missouri and near [64127].

By: Charles Poole
Charles Poole,
2104 Montgall
Kansas City, Missouri 64127